

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HESHAM ISMAIL,

Plaintiffs,

v.

IHI POWER SERVICES CORP.,  
MICHAEL PETTICORD, and  
KYLE ADLER,

Defendants.

Civil Action No. 2:20-CV-04801

AFFIDAVIT OF CHERYL MERCER

I, Cheryl Mercer, of full age, certifies as follows:

1. I am a Licensed Clinical Social Worker (LCSW) who retained Kathleen Redpath-Perez, Esq. in July of 2022 at a rate of \$500.00 per hour to defend me against my former employer Jeffrey Cox who I believe had maliciously filed an Order to Show Cause and suit against myself and another employee of his in the matter of Beautiful Minds T.C. v. Cheryl Mercer and Hilda Rivera, ATL-001770-22.
2. Mr. Cox claimed that I and Hilda were going to cost his business \$250,000.00 and he filed seeking an injunction against Hilda and I to prevent us from being gainfully employed.
3. I was scared and worried about what this Order to Show Cause and lawsuit could mean for the children and families I serve and how I would be able to financially survive if Mr. Cox succeeded.
4. Kathleen came in to help Hilda and I at the exact moment we needed her and provided competent and aggressive representation against Mr. Cox's nefarious requests.
5. Kathleen was able to limit the injunction issued against us and filed a countersuit against

Mr. Cox.

6. Kathleen was well worth her fee of \$500.00 per hour which I believe is fair and in line with her level of experience, skill and dedication.
7. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Electronically Signed 2022-12-01 18:56:15 UTC - 174.198.236.132



Dated: Nov. 30, 2022

Cheryl Mercer

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AFFIDAVIT OF CAROLINE M. TURNER,  
ESQUIRE

**CERTIFICATION OF CAROLINE TURNER, ESQ.**

1. I have been an attorney at Swartz Culleton, PC since January of 2018 where I specialize in nursing home neglect and medical malpractice. I previously worked as an Assistant Deputy Public Defender for the New Jersey Office of the Public Defender (OPD) from 2007 to 2018 and I am making this certification as an officer of the Court and subject to penalties for false swearing.

2. I graduated from Temple University James E. Beasley School of Law in 2005, have a Master's Degree from the University of Pennsylvania in Bioethics (2001) and was also a State Registered Nurse in the US. I also have an LLM in Trial Advocacy from Temple University where I graduated in 2010.

3. I am admitted and in good standing with the bars of the Supreme Court of Pennsylvania (2006) and Superior Court of New Jersey (2005), the United States District Courts for the Eastern and Middle Districts of Pennsylvania, the District of New Jersey, and the Court of Appeals for the Third Circuit.

4. I have also been a resident of Philadelphia for 6 years.

5. I make this certification in support of Kathleen Redpath-Perez, Esq. whom I met in 2013 when she was a young trial attorney. As I was already a very seasoned trial attorney and because I saw a lot of passion and potential in Kathleen, I took her under my wing and mentored her during her many trials at the OPD in Trenton, NJ.

6. I found Kathleen to be extremely hard working and dedicated to her clients. She often pulled "all nighters" which I know because I was often on the phone with her in the middle of the night counseling and assisting her with her trials.

7. Kathleen was extremely successful in trial which I attribute to her incredible work ethic, natural talent, and the care she has for her work and clients. Kathleen has something that cannot be taught when it comes to trial.

8. When I learned that Kathleen had gotten involved in this case so late in the game and learned some of the challenges with the case, I doubted that even Kathleen could pull a victory. She proved me wrong and I know she worked as hard as she has always worked to pull off such a victory.

Electronically Signed 2022-12-06 02:09:53 UTC - 172.58.176.248  
Caroline M. Turner  
Nintex AssureSign® 90250368-c1aa-4f90-b7d8-af63001ca8ec

Caroline M. Turner, Esq.

Dated: December 5, 2022